

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

WALTER L. CAMPBELL and JOHN T.  
CAMPBELL, enrolled members of the Tulalip  
Tribes and citizens of the State of Washington,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF  
INTERIOR; BUREAU OF INDIAN AFFAIRS;  
KENNETH L. SALAZAR; STANLEY M.  
SPEAKS; JUDITH R. JOSEPH,

Defendants.

NO. \_\_\_\_\_  
COMPLAINT FOR INJUNCTIVE  
RELIEF

**I. INTRODUCTION**

1. On April 15, 2010, Plaintiffs submitted a Freedom of Information Act (FOIA) request to the Bureau of Indian Affairs (BIA) seeking information pertaining to their undivided interests in an Indian allotment on the Tulalip Indian Reservation – Indian land that was allotted to Plaintiffs’ grandmother in 1904 and has belonged to their family ever since; Indian land that is now under threat of a forced sale facilitated by Defendants.

2. As a matter of federal law, Defendants must carry out the United States’ common law and statutory trust duty to Plaintiffs, as Native Americans and enrolled members of the Tulalip Tribes. *See generally Loudner v. U.S.*, 108 F.3d 896 (8th Cir. 1997). Despite

1 that duty, and the obligations imposed upon the BIA under FOIA – not the least of which is to  
2 provide Plaintiffs non-exempt responsive information within thirty days of receipt of their  
3 FOIA request pursuant to 5 U.S.C. § 552(a)(6)(C)(I) – Defendants have failed to disclose to  
4 Plaintiffs information they requested concerning their Indian land.

5 3. On April 4, 2011, Plaintiffs appealed the BIA's inaction to the Department of  
6 Interior FOIA Appeals Officer, which had twenty days to render a decision on Plaintiffs'  
7 appeal per FOIA. 5 U.S.C. § 552(a)(6)(A)(ii); 43 C.F.R. § 2.32(a). Despite Plaintiffs'  
8 numerous requests to Interior's FOIA Appeals Officer regarding the status of Plaintiffs' appeal,  
9 the Department of Interior has not rendered any decision on Plaintiffs' appeal, or apparently  
10 taken any action toward rendering a decision on the appeal.

11 4. Since April 2010, Plaintiffs have been unable to obtain the requested trust and  
12 other information about their allotted Indian lands from the BIA; since May 2011 Plaintiffs  
13 have been unable to receive any decision on their administrative appeal of the BIA's inaction  
14 from the Department of Interior FOIA Appeals Officer. As a result, Plaintiffs bring this action  
15 for preliminary and final injunction.

16 5. Plaintiffs seek an order enjoining Defendants from further withholding any non-  
17 exempt information that is responsive to their April 15, 2010 FOIA request, and directing  
18 Defendants to immediately disclose that information.

19 6. Due to the location of the Allotment, on the Tulalip Indian Reservation, the  
20 majority of the information owed to Plaintiffs is likely in the custody and control of the BIA  
21 Puget Sound Agency in Everett, Washington. Due to the BIA's documented history of not  
22 preserving Indian trust realty and other records, Plaintiffs also seek an order on preliminary  
23 injunction that enjoins Defendant Puget Sound Agency Superintendent Judith Joseph and her  
24 office from spoliating any information that is responsive to Plaintiffs' April 15, 2010, FOIA  
25 request. *See e.g. Cobell v. Norton*, 226 F.Supp.2d 1 (D.D.C. 2002); *see also Landmark Legal*

1 *Foundation v. E.P.A.*, 272 F.Supp.2d 70, 87 (D.D.C. 2003.) (imposing sanctions where  
2 “erasing email backup tapes . . . destroyed records during the pendency of [a] FOIA request.”).

3 7. Plaintiffs deserve to know what is happening behind closed federal doors with  
4 regard to land that has been in their family for over 100 years and is now under threat of forced  
5 sale, if not unconstitutional taking. Defendants’ failure to produce the requested information  
6 has directly affected Plaintiffs’ ability to protect their ancestral lands, and adequately defend  
7 against the impending forced sale of their grandmother’s cherished property.

## 8 II. PARTIES

9 8. Plaintiffs Walter L. Campbell and John T. Campbell are enrolled members of  
10 the Tulalip Tribes, a federally recognized Indian tribal government (“Tribes” or “Tribe”), and  
11 residents of the Tulalip Indian Reservation, near Marysville, Washington. Plaintiffs are owners  
12 of undivided interests, respectively, in a 56.64-acre parcel of land on the Tulalip Indian  
13 Reservation commonly known as Allotment 8-B. Plaintiffs are citizens of the State of  
14 Washington.

15 9. Defendants the United States Department of Interior (“Interior”) and Bureau of  
16 Indian Affairs, are agencies and instrumentalities of the United States.

17 10. Defendant Kenneth L. Salazar is the Secretary of Defendant the United States  
18 Department of Interior. Secretary Salazar is sued in his official capacity.

19 11. Defendant Stanley M. Speaks is the Regional Director for the Northwest  
20 Regional Office of Defendant BIA, with his principal place of business in Portland, Oregon.  
21 Director Speaks is sued in his official capacity.

22 12. Defendant Judith R. Joseph is the Superintendent for the Puget Sound Agency  
23 of Defendant BIA, with her principal place of business in Everett, Washington. Superintendent  
24 Joseph and is sued in her official capacity.

### III. JURISDICTION

13. The District Court has jurisdiction over this action pursuant to 5 U.S.C. § 552(a)(4)(B) and 28 U.S.C. § 1331.

14. Venue is proper in this District pursuant to 5 U.S.C. § 552(a)(4)(B).

### IV. FACTS

#### A. Background

15. Behalh (or Bah-hahtlh), whose Anglo-American name was Katrina Jim, was an original allottee of the Tulalip Indian Reservation. On February 25, 1904, through a deed signed by United States President Theodore Roosevelt, the United States allotted Behalh a 56.64 acre parcel of land – now commonly known as Allotment 8-B, or the Katrina Jim Allotment (“the Allotment”) – on the northeast corner of the Tulalip Indian Reservation. Behalh died on October 31, 1950, when she was believed to be age 74.

16. Today, the Allotment sits due north of the Tulalip Tribe’s Quil Ceda Village and in close proximity to Interstate 5. The Allotment, land that is now zoned commercial, is “considered to be one of the most valuable properties in Snohomish County.” Betty Lou Gaeng, *Bah-Hahtlh (Return to Good) Katrina Bagley*, in SNOHOMISH COUNTY WOMEN'S LEGACY PROJECT, WOMAN'S STORIES – WOMEN'S LIVES (2008).

17. Plaintiffs Walter Campbell and John Campbell are biological brothers, and Behalh’s biological grandsons. Walter Campbell and John Campbell each own a 7.5925926% undivided interest in the Allotment.

18. In 2008, Plaintiffs and several of their relatives, all of whom also own an undivided interest in the Allotment (collectively “the Landowners”), began a process towards commercial development of the Allotment. The Landowners chartered a corporation under Tulalip Tribal law. In honor of their revered grandmother and elder, the Corporation was named: Behalh Corporation, Inc., a/k/a Katrina Jim Corporation, Inc. (“the Corporation”).

1           19. From 2008 to July 2010, the Landowners negotiated a Ground Lease (or  
2 “master lease”), explaining the Corporation’s intent to lease the 56.64 acres from Behalh’s  
3 descendants (i.e., themselves) and in turn sublease the land without Defendants or  
4 Superintendent Joseph’s involvement for purpose of commercial real estate development.

5           20. By June 2009, the percentage of undivided interests in the Allotment owned by  
6 the group of Behalh’s descendants who supported the Corporation in its master lease and  
7 related development efforts totaled approximately 82 percent.

8           21. On Friday, July 23, 2010, the Tulalip Tribes mailed the Bureau a multi-million  
9 dollar offer to purchase Behalh’s descendants’ undivided interests in the Allotment. By  
10 Tuesday, July 27, 2010 – within an astonishing two working days of the Tribes’ offer,  
11 especially by federal standards – the BIA had consummated the first sale of an undivided  
12 interest in the Allotment to the Tribes.

13           22. Within three months, by October 21, 2010, the Tribes had purchased a  
14 controlling 51.726% of the Allotment from undivided interest owners. On that date, Defendant  
15 Superintendent Joseph denied the Corporation’s proposed Ground Lease because the Tribes  
16 had “purchased undivided interests totaling 51.726” in the Allotment and informed Defendant  
17 BIA that the Tribes “did not consent to the lease.”

18           23. On November 18, 2010, Plaintiffs and several other Landowners appealed  
19 Superintendent Joseph’s decision to Defendant Superintendent Speaks, which affirmed her  
20 decision on November 10, 2011. As with Defendants’ inaction in regard to Plaintiffs’ April 15,  
21 2010 and related appeal, Director Speaks violated Defendant BIA’s mandate that “[t]he BIA  
22 supervisory official that considers the appeal must issue a written decision in all cases appealed  
23 within 60 days after all time for written pleadings has expired.” *Stuart v. U.S.*, 109 F.3d 1380,  
24 1385 (9th Cir. 1997) (citing 25 C.F.R. § 2.19(a)).

1           24.     Plaintiffs' appeal of Superintendent Speaks' tardy November 10, 2011 decision  
2 is now pending before Defendant Department of Interior's Board of Indian Appeals. *See In the*  
3 *Matter of the Bureau of Indian Affairs' Decision on Proposed Ground Lease Between the*  
4 *Owners of Allotment 8-B and the Katrina Jim Corporation*, U.S. Dep't of Interior, Interior  
5 Board of Indian Appeals, Pre-Docketing Notice of Dec. 23, 2011. From what limited  
6 information they have been provided by Defendants, Plaintiffs' maintain that there were  
7 several infirmities in the Defendant BIA-facilitated purchase and sale transactions from July to  
8 October 2010 and thus in Defendant Superintendent Joseph's October 21, 2010 decision to  
9 deny the Master Lease.

10           25.     Most notably, Defendants failed to notify Plaintiffs and other Landowners of the  
11 purchase and sale activity as required by 25 U.S.C. § 2004. *See Anderson & Middleton Co. v.*  
12 *Salazar*, No. 09-5033, 2009 WL 2424446, at \*6 (W.D. Wash. Aug. 4, 2009) ("While the Tribe  
13 may indeed have the opportunity to purchase trust land at appraised fair market value, this is  
14 only true once the sale is advertised, an open bidding process is conducted, and no other offers  
15 for the purchase price are made.").

16           26.     Defendant Director Speaks defends Superintendent Joseph's and in turn his  
17 decision on the grounds that, *inter alia*, the deeds conveyed to the Tribes by several undivided  
18 interest owners were approved under the authority of 34 Stat. 1010, a statute that applies only  
19 to "noncompetent Indians"; the notice provision in 25 U.S.C. § 2004 applies "only to those  
20 individual landowners who . . . ha[ve] their homes on the land and [are] actually living on the  
21 land" and not pristine Indian commercial real estate; and Plaintiffs' and other Landowners'  
22 formation of a corporation and active commercial development of the Allotment do not amount  
23 to "use and possession" for the purpose of 25 U.S.C. § 2004. However, Plaintiffs are not  
24 noncompetent; they are competent, by any definition. And Defendants wholly ignored the  
25 notice mandate of 25 U.S.C. § 2004.

27. With a purported majority interest in the Allotment, Plaintiffs fear the Tribes will force a sale of their undivided interests, per federal law. 25 U.S.C. § 2204. Plaintiffs are also aware of irregularities involving the appraisal of the Allotment. The inadequacies of the appraisals will especially harm and prejudice Plaintiffs. Because Defendants have concealed other information regarding the appraisals and other federal action related to the Allotment, Plaintiffs do not know the extent of the federal government's trust failures.

**B. Plaintiffs' FOIA Request**

28. On April 15, 2010, Plaintiffs submitted a FOIA request to Defendant BIA for:

Any and all documents, records, correspondence, notes, faxes, emails or other information dating back to the year 2000, which refer or relate to the 56-acre Katrina Jim Allotment on the Tulalip Indian Reservation; the Katrina Jim Corporation; and/or a proposed master Ground Lease between the Katrina Jim heirs and the Katrina Jim Corporation, which has been under Bureau review since July 8, 2009.

A true and correct copy of Plaintiffs' April 15, 2010 FOIA request is appended hereto as Appendix A.

29. On May 20, 2010, Plaintiffs "offered to suspend the above-referenced FOIA request with the understanding [Appellants] can reinstitute it if needed at a later date." Plaintiffs did so voluntarily so that Defendants could focus federal resources on approval of the Ground Lease, rather than producing responsive information. By May 20, 2010, the BIA had not produced any documents responsive to Plaintiffs' FOIA request, as required by federal law. 5 U.S.C. § 552(a)(6)(A)(i). Plaintiffs reinstituted their FOIA request on October 28, 2010, which Defendant BIA acknowledged.

30. Starting on January 26, 2011 – long past the thirty day response deadline set forth in 5 U.S.C. § 552(a)(6)(A)(i), by any count – Defendant BIA produced the first installment of documents responsive to Plaintiffs' April 15, 2010 FOIA request. Defendant BIA produced further installments on March 14, June 16, August 18, 2011, and January 9,

2012. Defendants have yet to produce all of the information responsive to Plaintiffs' April 15, 2010 FOIA request. In particular, Defendants have yet to produce responsive emails or other written communication between Superintendent Joseph and other BIA officials or employees. Defendants have not indicated that they are withholding any such information.

31. Fearing a forced sale caused by the Tribes and facilitated by Defendants, particularly Superintendent Joseph, Plaintiffs have routinely inquired of Defendant BIA about the status of their April 15, 2010 FOIA request. The BIA ignored many of Plaintiffs' inquiries.

32. On May 9, 2011, Plaintiffs wrote Defendant Director Speaks:

As trust beneficiaries, the beneficiaries hereby request copies of any and all documents that refer or relate to:

1. The Bureau's purported sale of various undivided interests in Allotment 8-B to the Tulalip Tribes, circa July 2010.

2. The Bureau's appraisal of Allotment 8-B in April 2008 and November 2009, and its "Retrospective Appraisal" in February 2011. Such appraisal-related documentation shall include, without limitation, the appraisal work papers, for each of the three appraisals, especially the "Appraiser/Contractor's work file and supporting documentation" for the Retrospective Appraisal. See Retrospective Appraisal, Statement of Work, p. 8, sec. e.

The beneficiaries' information request to their trustee is made independent of our clients' April 15, 2010 FOIA request, which is the subject of an appeal to Interior's FOIA Appeals Office. That said, in light of that year-old FOIA request, if not the Bureau's obligation to provide this requested information on its own initiative, the information should have been provided to the beneficiaries long ago. Indeed, the Bureau is bound to respond to

beneficiaries' requests for information fully and truthfully, see Restatement (Second) of Trusts § 173 (1959); Restatement (Third) of Trusts § 171 cmt. C (2003) (recognizing a trustee's general duty to provide information), and allow beneficiaries to inspect the trust res, accounts, and related documents. See 2 Scott Law of Trusts, § 172 (3d. ed. 1967); 2 G. Bogert Law of Trusts and Trustees § 970 (rev. 2d ed. 1983). See also Eddy v. Colonial Life Ins. Co., 919 F.2d 747, 750 (D.C. Cir. 1990) ("[t]he duty to disclose material information is the core of a fiduciary's responsibility, animating the common law of trusts" and "[a]t the request of a beneficiary (and in some instances upon his own initiative), a



1 fiduciary must convey complete and correct material information to a  
 2 beneficiary.”) . . .

3 Special Master’s Report, Cobell v. Norton, No. 96-1285, Doc. 2219, p. 14  
 4 (D.D.C. Aug. 20, 2003) (emphasis, alterations in original).

5 Beneficiaries ask for the Bureau’s immediate, complete and accurate response to  
 6 this information request, and look forward to their receipt of the information or to  
 7 an opportunity to inspect all of the information in the Bureau’s Everett office. We  
 8 look forward to hearing from you or your staff in this particular regard, very soon.

9 Neither Defendant Speaks nor any of the other Defendants ever responded to Plaintiffs’ trust  
 10 information request.

11 33. Plaintiffs, through undersigned counsel, have routinely inquired of Defendant  
 12 BIA, specifically Marie Howerton, FOIA officers for Defendant BIA’s Northwest Regional  
 13 Office, as to the status of their FOIA request, most recently on November 17 and December  
 14 26, 2011 and January 17, 2012. For example:

- 15 • “Ms. Howerton, when might we finally be able to expect your completion and  
 16 closure of my clients’ April 2010 FOIA request? Please let me know. Thanks,  
 17 Gabe” (November 17, 2011)
- 18 • “Ms. Howerton, is been yet another five or six weeks since we’ve last heard from  
 19 you. Again, when might we finally be able to expect your completion and closure  
 20 of my clients’ April 2010 FOIA request? Please let me know. I don’t mean to be a  
 21 Scrooge but it is imperative, now twenty months after their initial FOIA request and  
 22 despite a long outstanding non-FOIA information request to the BIA and Everett  
 23 Superintendent, that my clients finally get the trust information owed to them.  
 24 Thanks, Gabe” (December 26, 2011)
- 25 • “Thank you, Ms. Howerton, for the latest installment of records responsive to my  
 clients’ April 15, 2010 FOIA request. When can we expect all outstanding  
 responsive documents? We note that responsive agency and intra-agency emails  
 and other communications have not yet been produced. Please let us know. Thank  
 you, Gabe” (January 17, 2012)

As of the date of this Complaint, Defendant BIA has not responded to any of Plaintiffs’ recent  
 requests for a status report.

1           **C.     Plaintiffs' FOIA Appeal Due to Defendants' Inaction**

2           34.     By April 2011, Plaintiffs, in continued fear of a forced sale by the Tribes and  
3 Defendants, and having not received from Defendant BIA proper responses or status reports  
4 regarding Plaintiffs' April 15, 2010 FOIA request, Plaintiffs' appealed Defendant BIA's  
5 inaction regarding that request to Defendant Department of Interior, in accordance with 43  
6 CFR § 2.28, *et seq.*

7           35.     On May 21, 2011, Defendant Department of Interior's FOIA Appeals Officer,  
8 Darrell R. Strayhorn, acknowledged receipt of Plaintiffs' FOIA appeal on May 19, 2011, "the  
9 date the Department received all of the documents [Plaintiffs were] required to submit in order  
10 to file an appeal." A true and correct copy of Defendant Interior's May 21, 2011 acceptance of  
11 Plaintiffs' FOIA inaction appeal is appended hereto as Appendix B. Despite Defendant BIA's  
12 partial installment of responsive records on January 26 and March 14, 2011, Department of  
13 Interior accepted Plaintiffs' appeal of the BIA's inaction, as contemplated by 43 CFR § 2.28, *et*  
14 *seq.*

15           36.     Defendant Department of Interior assigned Plaintiffs' appeal as "Appeal  
16 Number 2011-106." *See* Appendix B. Acknowledging that "FOIA requires an agency to make  
17 a determination on an appeal within 20 workdays after the receipt of such appeal. 5 U.S.C. §  
18 552(a)(6)(A)(ii)," Interior promised to "make every effort to reach a decision on [the] appeal  
19 within this time limit." *Id.* Defendant Department of Interior has not yet rendered any  
20 decision, or indicated to Plaintiffs that it has taken any procedural step towards doing so.

21           37.     Plaintiffs' contacted the office Defendant Department of Interior's FOIA  
22 Appeals Officer's on November 14 and December 9 and 26, 2011, and again on January 17,  
23 2012, inquiring about the status of Plaintiffs' appeal of the BIA's inaction in reference to their  
24 April 15, 2010, FOIA request. Defendant Department of Interior has failed to respond to  
25 several of Plaintiffs' inquiries.

1           38.     On December 27, 2011, Defendant Interior's FOIA Appeals Office promised  
2 that Plaintiffs would receive correspondence concerning Plaintiffs' appeal "shortly." Plaintiffs  
3 have received no such correspondence from Interior's FOIA Appeals Office.

4           39.     On January 17, 2012, Plaintiffs' again inquired of Defendant Interior's FOIA  
5 Appeals Office, specifically LaRima L. Lane, regarding the status of their FOIA inaction  
6 appeal. On January 17, 2012, Plaintiffs, through counsel, wrote:

7           "Ms. Lane:

8           We have not yet received your Office's promised correspondence. What is the status of  
9 my clients' FOIA appeal, which was acknowledged and accepted by your Office on  
10 May 19, 2011. It seems your Office has taken no action in regard to advancement  
11 of my clients' appeal in the last eight months, and our clients are still without all of the  
information they are legally owed in response to their April 15, 2010 FOIA request.  
Please let us know. Thank you kindly."

12 Like Defendant BIA, as of the date of this Complaint Defendant Interior has not responded to  
13 Plaintiffs' repeated requests for a status report.

14           **D.     Current Posture of Defendants' Inaction**

15           40.     As of the date of this Complaint, Defendant BIA has not produced information  
16 concerning Plaintiffs' undivided interest in the Allotment and has thereby not fully responded  
17 to Plaintiffs' April 15, 2010, FOIA request or Plaintiffs' May 9, 2011, trust beneficiary  
18 information request. Likewise, Defendant Interior's FOIA Appeals Office has taken no action  
19 to decide Plaintiffs' May 21, 2011, appeal of the BIA's inaction. Defendants have *per se*  
20 violated FOIA. 5 U.S.C. § 552(a)(6)(C)(I), (A)(ii); 43 C.F.R. § 2.32(a).

21           41.     On January 21, 2009, President Barack Obama issued a Memorandum to the  
22 heads of all United States Executive Branch departments and agencies concerning FOIA (the  
23 "Obama FOIA Memo"). The Obama FOIA Memo provides, in pertinent part, that "[a]ll  
24 agencies should adopt a presumption in favor of disclosure, in order to renew their  
25 commitment to the principles enshrined in FOIA, and to usher in a new era of open

1 Government. The presumption of disclosure should be applied to all decisions involving  
 2 FOIA.” Defendants have failed to comply with the mandate of the Obama FOIA Memo. *See*  
 3 *Shinnecock Indian Nation v. Kempthorne*, 652 F.Supp.2d 345, 353 (E.D.N.Y. 2009) (requiring  
 4 Interior’s disclosure of documents pursuant to a FOIA request “in light of President Barack  
 5 Obama’s memorandum on the FOIA”).

6 42. The purpose of FOIA, as a “check against corruption,” is doubly critical in this  
 7 context, where Defendants’ behavior is governed by the “most exacting fiduciary standards.”  
 8 *NLRB v. Robbins Tire & Rubber Co.*, 437 U.S. 214, 242 (1978); *Seminole Nation v. United*  
 9 *States*, 316 U.S. 286, 296-97 (1942).

10 43. Plaintiffs are entitled to know everything about Defendants’ decision-making in  
 11 recent years concerning the Allotment and the process that led them there. Instead, the process  
 12 by which Defendants have conspired to force the sale of Plaintiffs’ ancestral lands has been  
 13 concealed, in violation both of FOIA and Defendants’ trust duties. Plaintiffs have been both  
 14 patient and diligent in search of the information they are owed. Defendants have met  
 15 Plaintiffs’ good faith with delay and neglect. As such, Plaintiffs bring this action.

## 16 V. CAUSE OF ACTION

17 44. Plaintiffs hereby incorporate and reallege Paragraphs 1-43.

18 45. Defendants’ refusal and failure to provide the requested documents, and their  
 19 current withholding of such documents, violates FOIA.

20 46. Defendants’ failure to answer Plaintiffs’ requests and subsequent appeal of that  
 21 inaction violated FOIA.

V. RELIEF

WHEREFORE, Plaintiffs prays for the following relief:

A. A preliminary and final injunction preventing Defendants from withholding from plaintiff the records requested;

B. An award of costs and attorneys fees, pursuant to 5 U.S.C. § 552(a)(4)(E);

C. That the Court issue a written finding, pursuant to 5 U.S.C. § 552(a)(4)(F), that the circumstances surrounding the withholding – particularly the breach of Defendants’ trust obligations owed to Plaintiffs – was an arbitrary and capricious act having no basis in law; and,

D. That the Court grant Plaintiffs such other and further relief as the Court deems just and proper.

Plaintiff reserve the right to amend this Complaint to plead new parties, claims and/or allegations.

DATED this 23<sup>rd</sup> day of January 2012.

s/Gabriel S. Galanda  
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